

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In re:

FTX TRADING LTD., *et al.*,<sup>1</sup>

Debtors.

Chapter 11

Case No. 22-11068 (JTD)

(Jointly Administered)

**NOTICE OF DEBTORS' INTENT TO OFFER WITNESS  
TESTIMONY AT THE HEARING ON JANUARY 11, 2023**

**PLEASE TAKE NOTICE** that FTX Trading Ltd. and its affiliated debtors and debtors-in-possession (collectively, the “Debtors”) hereby provide the following information regarding the witnesses they intend to present at the hearing scheduled in the above-captioned chapter 11 cases (the “Chapter 11 Cases”) on January 11, 2023 (the “Hearing”):

**INFORMATION ON WITNESS NUMBER ONE**

1. Name and title of witness: Kevin M. Cofsky, Partner at Perella Weinberg Partners L.P., the Debtors’ proposed investment banker.
2. Scope of testimony: Mr. Cofsky will testify regarding (a) the potential value of the Debtors’ customer list and related matters in connection with the *Motion of Debtors for Entry of Interim and Final Orders (I) Authorizing the Debtors to Maintain a Consolidated List of Creditors in Lieu of Submitting A Separate Matrix for Each Debtor, (II) Authorizing the Debtors to Redact or Withhold Certain Confidential Information of Individuals and (III) Granting Certain Related Relief* [D.I. 45] and (b) the marketing and sale process, proposed bid procedures and proposed stalking horse procedures and related matters in connection with the *Motion of Debtors for Entry of Orders (I)(A) Approving Bid Procedures, Stalking Horse Protections and the Form and Manner of Notices for the Sale of Certain Businesses, (B) Approving Assumption and Assignment Procedures and (C) Scheduling Auction(s) and Sale Hearing(s) and (II)(A) Approving the Sale(s) Free and Clear of Liens, Claims, Interests and Encumbrances and (B) Authorizing Assumption and Assignment of Executory Contracts and Unexpired Leases* [D.I. 233].

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<sup>1</sup> The last four digits of FTX Trading Ltd.’s and Alameda Research LLC’s tax identification number are 3288 and 4063 respectively. Due to the large number of debtor entities in these Chapter 11 Cases, a complete list of the Debtors and the last four digits of their federal tax identification numbers is not provided herein. A complete list of such information may be obtained on the website of the Debtors’ claims and noticing agent at <https://cases.ra.kroll.com/FTX>.

3. Direct testimony of witness: Mr. Cofsky's direct testimony has been presented through the (a) *Declaration of Kevin M. Cofsky in Support of Debtors' Motion for Entry of an Order Authorizing Debtors to Redact or Withhold Certain Confidential Information* [D.I. 411] and (b) *Declaration of Kevin M. Cofsky in Support of Motion of Debtors for Entry of Orders (I)(A) Approving Bid Procedures, Stalking Horse Protections and the Form and Manner of Notices for the Sale of Certain Businesses, (B) Approving Assumption and Assignment Procedures and (C) Scheduling Auction(s) and Sale Hearing(s) and (II)(A) Approving the Sale(s) Free and Clear of Liens, Claims, Interests and Encumbrances and (B) Authorizing Assumption and Assignment of Executory Contracts and Unexpired Leases* [D.I. 413]. The Debtors may elicit additional direct or rebuttal testimony from Mr. Cofsky at the Hearing.
4. Location and place from which the witness will testify: Mr. Cofsky will be available to testify in person.

#### **INFORMATION ON WITNESS NUMBER TWO**

1. Name and title of witness: Edgar W. Mosley II, Managing Director at Alvarez & Marsal North America, LLC, the Debtors' proposed financial advisors.
2. Scope of testimony: Mr. Mosley will testify regarding the Debtors' ability to file Schedules and Statements and 2015.3 Reports by current deadlines and related matters in connection with the (a) *Motion of Debtors for Entry of an Order (I) Extending the Time to File (A) Schedules of Assets and Liabilities and Statements of Financial Affairs and (B) Rule 2015.3 Financial Reports and (II) Granting Certain Related Relief* [D.I. 26] and (b) *Supplement to Motion of Debtors for Entry of an Order Extending the Time to File (A) Schedules of Assets and Liabilities and Statements of Financial Affairs and (B) Rule 2015.3 Financial Reports* [D.I. 266].
3. Direct testimony of witness: Mr. Mosley's direct testimony has been presented through the (a) *Declaration of Edgar W. Mosley II in Support of Chapter 11 Petitions and First Day Pleadings* [D.I. 57] and (b) *Declaration of Edgar W. Mosley II In Support of Debtors' Supplement to Motion of Debtors for Entry of an Order Extending the Time to File (A) Schedules of Assets and Liabilities and Statements of Financial Affairs and (B) Rule 2015.3 Financial Reports* [D.I. 266-2]. The Debtors may elicit additional direct or rebuttal testimony from Mr. Mosley at the Hearing.
4. Location and place from which the witness will testify: Mr. Mosley will be available to testify in person.

**RESERVATION OF RIGHTS**

The Debtors reserve the right to amend and supplement this witness list at any time prior to the Hearing. Additionally, the Debtors reserve all rights to cross examine any and all witnesses proffered at the Hearing, and to call any rebuttal witnesses as they may deem necessary at the Hearing.

Dated: January 9, 2023  
Wilmington, Delaware

**LANDIS RATH & COBB LLP**

/s/ Matthew R. Pierce

Adam G. Landis (No. 3407)  
Kimberly A. Brown (No. 5138)  
Matthew R. Pierce (No. 5946)  
919 Market Street, Suite 1800  
Wilmington, Delaware 19801  
Telephone: (302) 467-4400  
Facsimile: (302) 467-4450  
E-mail: landis@lrclaw.com  
brown@lrclaw.com  
pierce@lrclaw.com

-and-

**SULLIVAN & CROMWELL LLP**

Andrew G. Dietderich (admitted *pro hac vice*)  
James L. Bromley (admitted *pro hac vice*)  
Brian D. Glueckstein (admitted *pro hac vice*)  
Alexa J. Kranzley (admitted *pro hac vice*)  
125 Broad Street  
New York, NY 10004  
Telephone: (212) 558-4000  
Facsimile: (212) 558-3588  
E-mail: dietdericha@sullcrom.com  
bromleyj@sullcrom.com  
gluecksteinb@sullcrom.com  
kranzleya@sullcrom.com

*Proposed Counsel for the Debtors  
and Debtors-in-Possession*